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22<sup>nd</sup> January 2026

Dear Convener,

### **Consumer Scotland Draft Work Programme 2026-2027**

Consumer Scotland has today published our [Draft Work Programme for 2026-2027](#) setting out our priorities for the coming year. I am pleased to provide a copy to the Committee for its views.

The programme demonstrates how our priorities will enable us to progress our statutory consumer outcomes through the functions set out in the Consumer Scotland Act 2020. We will focus on our levy-funded activity in the energy, heat networks, post and water sectors as well as other key markets for consumers in Scotland including telecommunications, housing, home improvements and financial services.

Our specific priorities include our investigation into Scotland's used car market, building upon our work to promote an effective system for recall of goods, continuing to promote the Consumer Duty as an enabling resource to support the delivery of effective public service reform, and supporting our delivery partners to provide effective advice and support to consumers.

We have designed our work programme around a theory of change model to communicate the impact our work delivers.

We have launched an [online public survey](#) seeking views on the programme, which runs until **Thursday 19 February**. Following an analysis of feedback from the Committee, the views of stakeholders, and our public consultation, we will publish our final work programme in March and lay it before the Scottish Parliament.

We look forward to your views. Please let me know if you require any further information or would like to discuss any aspect of the draft work programme.

Yours sincerely,



Sam Ghibaldan

# **Consumer Scotland Draft Work Programme 2026-2027**

Improving outcomes for  
consumers in Scotland

January 2026

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# 1. Introduction

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## Building consumer confidence in a complex world

Consumers lead busy lives. They must navigate a myriad of complex markets, from financial services to telecoms, from purchasing a car to renting a home, or maintaining a home that they own. With each new transaction or contract people are acting as consumers – even if they don't necessarily think in those terms.

The widespread complexity of many markets is often being accentuated by new technologies. These can support the development of new products and services, and underpin the development of new platforms on which those products are sold.

The opportunity this creates to be able to access a wider range of goods and services more flexibly, is positive for consumers. However, the growing intricacy of markets, combined with a complex patchwork of consumer rights and redress across different markets, can dent consumer confidence.

Weakened consumer confidence has been exacerbated by a range of high-profile and widespread cases of consumer detriment – from government backed insulation schemes to finance products in a regulated market – combined with ongoing weakness in household spending power following the cost-of-living crisis.

Weakness of consumer confidence is bad for consumers. It can also be damaging to the economy more broadly.

And whilst enhanced choice is a positive, affordability challenges, geographic barriers and other socio-demographic characteristics can create inequalities in access to a wide range of essential goods and services.

This sets a challenging agenda for policy makers: supporting informed choices, addressing inequalities of access, and empowering consumers to participate in markets. By ensuring that the economy works fairly and inclusively for consumers, consumers can help underpin a healthy, robust economy.

**Our draft Forward Work Programme sets out the key activities that Consumer Scotland intends to focus on during 2026-2027 to improve outcomes for consumers in Scotland.**

**For each of our five statutory outcomes we set out the issues that matter to consumers, how we will use our functions to tackle these issues, and the impact that our work will deliver.**

# The role of Consumer Scotland

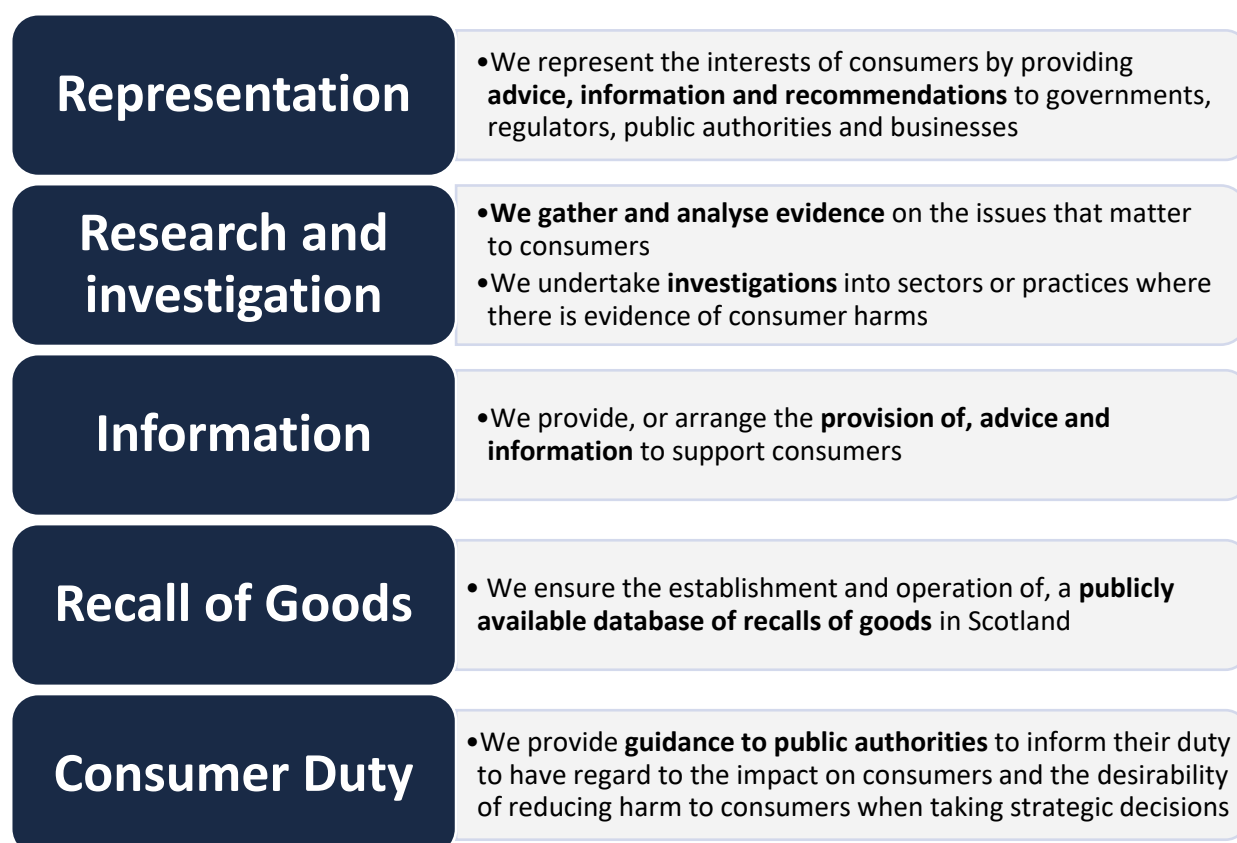
Consumer Scotland is the **statutory, independent body** for consumers in Scotland.

Through our work we aim to **improve outcomes** for current and future consumers in Scotland, driven by our ambition that every consumer in Scotland is able to participate in a **fair and sustainable economy**, confident their needs and aspirations will be met.

Our work is focused on our five statutory outcomes:



We deliver our general function of consumer advocacy and advice to achieve these outcomes, which we advance through our **five statutory functions**.



In delivering these functions we:



Tackle the **issues that matter for consumers across Scotland's economy**. We are the levy-funded advocacy body for the electricity, gas, heat network, post and water sectors in Scotland. We also deliver work across a wide range of other consumer markets, including housing, telecommunications, finance and transport.



Play a **key leadership role** in Scotland's consumer landscape and we work in **collaboration and partnership** with organisations including regulators, advice agencies, enforcement bodies and other public and third sector consumer organisations



Have a specific focus on our **three strategic objectives**, as set out in our Strategic Plan for 2023-2027: improving the **affordability** of goods and services; taking action that supports consumers to mitigate and adapt to the effects of **climate change**; and addressing the issues that matter most to **consumers in vulnerable circumstances**



Are informed by the **internationally recognised consumer principles**, which set out what good consumer outcomes look like for any given market or service. These principles are: **Access, Choice, Safety, Information, Fairness, Representation and Redress**. We also consider an additional principle of **Sustainability**.

## 2. How we work

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### Leading the consumer landscape

As Scotland's statutory consumer body, we provide a leadership role across Scotland's consumer landscape. We do this by:

- **Working in partnership** with key delivery bodies including **Advice Direct Scotland, Citizens Advice Scotland, Trading Standards Scotland and the Society of Chief Officers of Trading Standards in Scotland**, recognising the vital contribution and specific expertise that each organisation brings
- **Convening key collaboration networks** which bring together advice agencies, enforcement bodies, regulators and others to share intelligence and expertise including:
  - The Consumer Sector Chief Executives Leadership Group
  - The Consumer Network for Scotland
  - The Energy Consumers Network, which also serves as a Strategic Leadership Group of the Scottish Energy Advisory Board
- **Promoting the principles of public service reform** within the sector and by working closely with other public bodies to maximise the efficiency of our operations

### Evidence-led advocacy

**Developing and delivering robust, high quality evidence on consumer matters underpins our work as Scotland's statutory consumer body.**

We do this through:

- **direct engagement with consumers** to gather their views across a wide range of markets and services, using a range of qualitative and quantitative research methodologies.
- **scrutinising robust datasets** from government, regulators and other public authorities, applying our analytical capacity to interpret this data from a uniquely consumer perspective
- **analysing** important evidence from our frontline delivery partners who work directly with consumers
- **bringing together** this evidence with our cross-market expertise of consumer priorities and our in-depth understanding of key consumer markets
- **developing credible recommendations** to deliver change for consumers

- **representing the interests of consumers** to parliament, public authorities, industry and other key stakeholders as a means of influencing strategic decision-making

## Investigations

**Our investigations function is a central part of our work** to identify and advocate for improvements that are required in different markets and services to protect consumers and advance their interests.

In Q4 2025-2026, we enhanced the capacity of our investigations function to further develop our investigation pipeline, which will inform our investigations delivery in 2026-2027.

## Advice and Information for consumers

We work with our third sector delivery partners Advice Direct Scotland, Citizens Advice and Citizens Advice Scotland to secure the provision of **advice, information** and **support** for consumers in Scotland and ensure consumers have the help they need to deal with the problems they are experiencing.

We are focused on ensuring a simple consumer journey and we are working closely with our partners in the sector to help bring greater coherence and effectiveness in line with the Scottish Government's public service reform agenda.

We are working closely with key consumer landscape partners to review the provision of consumer information in Scotland and identify gaps that require to be filled. During 2026-2027 we will also consider opportunities emerging from our advocacy work on behalf of consumers to develop new information materials, where these are required.

An overview of our strategic funding partnerships to support the provision of information and advice in 2026-2027 is provided in Chapter 5.

## Prevention

Through partnership working, we will continue to support our delivery partners with their prevention work which is vital in ensuring consumers avoid experiencing harm. This includes the scam prevention work both Consumer Scotland and our partners are delivering including:

- working in partnership with Young Scot to gather new evidence on the experiences and concerns of young people in Scotland about scams
- representing the safety rights of consumers through membership of groups such as the Scottish Anti Illicit Trade working group and digital sector group
- focusing on AI-based fraud patterns, cryptocurrency scams, fraud affecting neurodivergent and older consumers
- information campaigns on doorstep and social media scams



# 3. Our 2026-2027 Priorities

Our consumer advocacy and advice in 2026-2027 will seek to **secure improvements for consumers in Scotland across our five outcomes**. Table 1 below provides a summary of our priorities and how we will address them. More detailed ‘theories of change’ to support these priorities are provided in Chapter 4, with details of our strategic partnerships to support information and advice provision set out in Chapter 5.

**Table 1: Summary of Consumer Scotland 2026-2027 Priorities**

Outcome	Our Priorities
Reducing consumer harm	Investigating Scotland’s <b>used car</b> market
	Tackling consumer detriment in <b>home improvements</b>
	Supporting <b>vulnerable water consumers</b>
	Preventing and dealing with <b>water debt</b>
	Tackling <b>water poverty</b>
	Advocating for more affordable <b>energy bills</b>
	Promoting an effective system for the <b>recall of goods</b>
	Funding vital <b>consumer advice</b> services delivered by our key partners
Increasing consumer confidence	Representing <b>consumer interests in financial services</b>
	Improving consumer outcomes in the <b>non-household water market</b>
	Improving consumer experiences of <b>Third Party Intermediaries</b>
	A <b>universal postal service</b> that consumers have confidence in
	Improving outcomes for <b>tenants</b>
	Improving <b>information and redress for postal consumers</b>
Improving the consideration of consumer matters by public bodies	Delivering Scotland’s <b>Consumer Welfare Report</b>
	Advancing the <b>Consumer Duty</b>
	Putting water consumers at the heart of the <b>Strategic Review of Water Charges for 2027-2033</b>
Promoting sustainable consumption	A <b>water system</b> that responds to climate change
	A <b>circular economy</b> that works for consumers
	<b>Heat networks</b> delivering for consumers
	Tackling barriers to the <b>take-up of Electric Vehicles</b>
	Access to <b>low carbon technologies and advancing energy efficiency</b>
Advancing inclusion, fairness, prosperity and wellbeing	Fast, affordable and reliable <b>telecommunications</b>
	Reduced <b>electricity distribution charges</b>
	Accelerating the <b>roll out of smart meters</b>
	A <b>future energy retail market</b> that works for consumers in Scotland
	<b>Fair and equitable postal</b> services
	Strengthening evidence on <b>issues that matter for water consumers</b>

## 4. Delivering our Priorities: Improving Consumer Outcomes

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Consumer Scotland's Performance Framework includes **our Strategic Theory of Change**, which describes our approach to delivering our priorities to improve consumer outcomes.

Based on an abbreviated version of our strategic model, we set out here the theory of change that underpins each of the priorities listed in Table 1 and describe:

- **The problem or opportunity we are seeking to address**
- **What we will do and who we will work with**
- **What we want to be done differently as a result**
- **The impact this would have for consumers**

## Reducing consumer harm

### Investigating Scotland's used car market

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>The used car sector is a major source of consumer complaints in Scotland, with ongoing concerns about vehicle quality, misrepresentation, complex liability between traders and finance providers, and unclear routes to redress.</p> <p>As buying becomes more digital and remote, it becomes harder for consumers to choose vehicles with confidence, navigate finance and know who is accountable.</p>	<p>We will draw on three core evidence sources:</p> <ul style="list-style-type: none"><li>• Consumer research (quantitative and qualitative)</li><li>• Analysis of national complaints data with illustrative case studies</li><li>• Engagement with key stakeholders across industry, enforcement, advice and redress</li></ul> <p>We will publish findings and recommendations and work with partners to support practical improvements.</p>	<p>Clearer, more consistent standards across enforcement and advice - with traders, platforms and finance providers improving transparency and redress routes, reducing risk and increasing fairness.</p>	<p>Consumers face less detriment through better-informed decision making when faced with poor-quality or misdescribed vehicles - and can access clearer, faster redress.</p> <p>The market becomes more transparent, trustworthy and easier to navigate, improving confidence and wellbeing.</p>

## Reducing consumer harm

### Tackling consumer detriment in home improvements

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Evidence suggests that consumers in Scotland experience high levels of detriment when purchasing home improvement services. This includes works such as kitchen and bathroom fitting, roofing, and building works.</p> <p>Consumers can experience high levels of detriment as a result of poor quality services and it is not always clear how they can obtain a resolution when they are dissatisfied.</p>	<p>We will commission qualitative research exploring the issues faced by consumers who have experienced issues following making purchases in this sector.</p> <p>We will publish our key findings and recommendations, and use them to advocate for changes that will improve the outcomes for consumers purchasing services in this sector.</p>	<p>Businesses providing home improvement services will operate in a reliable, fair, and transparent manner, guided by high standards and good practice.</p> <p>Consumers will have a better understanding of the steps they can take to inform their purchase decisions and will understand what steps they may be able to take to resolve issues post purchase, decreasing their risk of detriment.</p>	<p>Consumers can make better informed purchase decisions, leading to more services being carried out in a reliable and effective manner. Where possible, consumers will know how to access clear resolution pathways if things go wrong.</p>

## Reducing consumer harm

### Supporting vulnerable water consumers

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>A priority services register (PSR) identifies utilities consumers who would benefit from additional services or support for a variety of identified characteristics. This can be particularly important during emergencies like power cuts, and helps with daily needs.</p> <p>Scottish Water currently has 28,000 customers registered on its PSR. In contrast there are 100,000 consumers in Scotland registered on energy PSRs. There is a risk that potentially vulnerable water customers are not registered to receive support they may need.</p>	<p>Consumer Scotland will conduct an analysis of UK essential service sectors to assess the level of support offered to consumers in vulnerable circumstances, including Scottish Water. We will publish recommendations.</p> <p>We will continue to work with Scottish Water and other key water sector stakeholders to push for more to be done to ensure that Scottish Water's PSR is reflective of those that require additional support.</p>	<p>Consumer Scotland wants to see a firm, clear commitment from Scottish Water to increase the size of its PSR to be reflective of those in need in Scotland. Furthermore, we want registration to be promoted and accessible to those requiring additional support.</p> <p>We will encourage collaboration across utilities to make registration simpler for consumers and boost the number of consumers registered on PSRs.</p>	<p>An enhanced PSR would provide more water consumers in Scotland with access to:</p> <ul style="list-style-type: none"> <li>- Emergency support</li> <li>- Daily assistance</li> <li>- Support with specific communication needs</li> <li>- Enhanced safety provisions</li> <li>- More accessible information</li> <li>- Advance notice of planned service interruptions</li> </ul>

## Reducing consumer harm

### Preventing and dealing with water debt

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
Research shows 1 in 5 Scottish consumers face water and sewerage debt, driven by unclear billing and partial discounts for low-income households. Charges are collected via Council Tax by local authorities, not Scottish Water, leading to inconsistent debt recovery practices. Current reductions include Council Tax Reduction, single occupancy, and exemptions. Lack of awareness of liability to pay can worsen debt issues for consumers.	<p>In 2025-2026 Consumer Scotland is delivering new research to provide updated data and qualitative research on consumer experiences of water debt in Scotland.</p> <p>In 2026-2027 we will use the insights from the research to propose robust recommendations for change. We will engage with Scottish Water and local authorities to press for action to deliver improvements for consumers.</p>	<p>Improved access to up-to-date data on household water and sewerage debt collected by local authorities.</p> <p>Clearer billing information for consumers, particularly for those exempt from Council Tax who may still have water charge liabilities.</p> <p>Improved debt recovery approaches which consider affordability impacts on low-income households. Strengthened collaboration between Scottish Water and local authorities to enhance transparency and support for consumers.</p>	<p>A clearer understanding amongst consumers about how water charges are calculated and collected.</p> <p>A stronger preventative approach from public authorities to help stop consumers accruing water debt.</p> <p>More consumer-friendly debt recovery processes, reducing the stress and financial burden such processes can place on consumers.</p>

## Reducing consumer harm

### Tackling water poverty

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
More than 10% of households in Scotland (around 275,000 households) live in water poverty. Within this group, 120,000 households are in severe water poverty. Water charges are likely to rise significantly during the next decade to pay for required investment in Scotland's water sector infrastructure, responding to the pressures of climate change. Action is required to ensure that these charges do not have a disproportionately harmful impact on low income consumers, or push more consumers into water poverty.	In 2025-2026, Consumer Scotland will publish updated affordability forecasts to inform the Strategic Review of Charges (SRC 2027-33) process and highlight the impact on the water poverty rate of some of the options under consideration during the review. During 2026-27, we will review this data. We will use our analysis to inform key final decision stages during the review, including the final ministerial objectives and principles of charging and the final determination.	Our core recommendations remain focused on a series of key interventions: <ul style="list-style-type: none"><li>• Action to increase uptake of Council Tax Reduction amongst eligible consumers</li><li>• Increasing the level of discount provided through the Water Charge Reduction Scheme</li><li>• Establishment of a 'by-application' scheme to support low income consumers not reached through existing financial relief</li><li>• Action to improve the automatic targeting of affordability support in the subsequent charging period</li></ul>	Water will be affordable for low income consumers across Scotland and a sharp rise in the water poverty rate will be averted.  The Strategic Review of Charges process for water for 2027 will deliver a final determination that protects low income consumers.

## Reducing consumer harm

### More affordable energy bills

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Many Scottish energy consumers struggle to meet their energy needs. Financial supports available to those in need have not kept pace with the level of energy bills. And higher consumption does not mean higher income, so households with unavoidably high energy use are not effectively protected under current arrangements.</p> <p>The system needs to be improved to ensure there is a better link between consumption and financial support, and to ensure that more households have access to devices and infrastructure that can help them to reduce their bills.</p>	<p>We will produce analysis and recommendations for how struggling consumers can be better supported, whether via alterations to existing schemes, such as the Warm Home Discount, or creating new mechanisms such as a social tariff. We will also consider the effectiveness of interventions to tackle energy debt. We will advocate for action by the UK and Scottish governments, including work on data to make sure that financial supports are effectively targeted. We will analyse which forms of low carbon technologies represent the best value for money, and if appropriate advocate for enhanced funding to make sure more households can access these.</p>	<p>DESNZ and Scottish government to take action to improve the financial supports available to energy consumers.</p>	<p>A fair set of supports to ensure all consumers are able to meet a basic level of energy demand, without placing an undue burden on other consumers.</p>



## Reducing consumer harm

### Promoting an effective system for the recall of goods

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>When a safety problem with a consumer product is identified after it has entered the market, it is recalled by the manufacturer.</p> <p>The Office of Product Safety Standards (OPSS) operates a UK-wide public database and it is Consumer Scotland's statutory duty to ensure consumers in Scotland have access to it.</p> <p>We also want consumers to know how to register purchased electrical goods and where to access advice when something goes wrong.</p>	<p>Following our 2025 information campaign, we will continue to highlight the importance of registering goods and accessing the recall register.</p> <p>We will engage with parliamentarians and advice bodies to ensure consistent messaging around product safety and where to access advice and support.</p> <p>We will continue to work with OPSS on the design of the new recall database to ensure it reflects the needs of consumers in Scotland.</p>	<p>Building on our information campaign and website developments, information on steps to take, and where to find advice and support, after purchasing a faulty good will be easier to access and understand for consumers.</p> <p>Those who provide advice and support to consumers on product safety matters will do so in a more consistent manner with clear messaging on steps to take.</p> <p>The UK-wide refreshed recall database will be easily accessible for all consumers.</p>	<p>Consumers will be more aware of the importance of registering electrical products after purchasing them.</p> <p>Consumers will have a stronger awareness of the recall of goods register along with what steps to take when they find themselves in receipt of a faulty good.</p> <p>The consumer journey in relation to product recall will be more straightforward, reducing complexity for consumers.</p>

## Increasing consumer confidence

### Representing consumer interests in financial services

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Access to financial products and services is essential for consumers and enables their participation in other markets. When consumers are unable to access financial products and services they can experience detriment.</p> <p>Consumers in Scotland face a range of challenges accessing financial products and services that meet their needs. These include embedded higher prices, Scotland's unique geography and demographics and a post-covid debt and arrears legacy.</p>	<p>We will work with other policy, regulatory, governmental and advice bodies to identify and advocate for the needs of consumers. We will participate in working groups and respond to consultations, highlighting the specific challenges consumers in Scotland face.</p> <p>We will work across a range of issues including financial advice, financial literacy and inclusion. We will also explore issues around access and choice, focusing on access to cash and banking facilities.</p>	<p>The challenges faced by consumers in Scotland, including those in remote and rural areas, will be considered by policy makers at an early stage of policy development. This will allow potential detriment to be identified and mitigated during implementation of proposals.</p> <p>UK stakeholders will have a greater awareness of the specific challenges faced by consumers in Scotland and will take action to support more equitable access to financial services.</p>	<p>Consumers in Scotland, including those in vulnerable circumstances, have access to financial products and services that suit their needs and suit their circumstances.</p> <p>Consumers can confidently participate in the market and their use of financial services facilitates access to other markets.</p>

## Increasing consumer confidence

### Improving consumer outcomes in the non-household water market

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
The water market in Scotland for non-domestic consumers is a competitive market, with businesses able to choose from a range of different water suppliers. However, the current arrangements do not always deliver effectively for business consumers. Common difficulties include issues with customer service and access to redress, while the potential benefits of competition are diluted by limited consumer switching.	Consumer Scotland supported the development of a first Code of Practice for providers in the non-household market to tackle some of the difficulties experienced by consumers. The Code launched in April 2025 and has been followed by a 'Market Health Check' validation process. In 2026-2027 we will deliver new research with non-household customers to test customers' experience of market offerings and whether the Code and concurrent market changes are delivering improved outcomes.	<p>Improved customer service for business water customers</p> <p>Consumers more informed on different suppliers and more willing and able to exercise choice, improving competition and driving up standards</p> <p>New opportunities identified to further improve the Code of Practice, bringing further benefits to consumers</p>	More affordable, reliable and customer-focused services for non-household water consumers in Scotland

## Increasing consumer confidence

### Improving consumer experiences of Third Party Intermediaries (TPIs)

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Third party intermediaries (TPIs) operating in the energy market are not currently directly regulated. This reduces consumer confidence when engaging with these services, and poor practices are more difficult to address.</p> <p>The UK government have signalled their intention to give Ofgem powers to regulate TPIs, and Consumer Scotland a role in advocating on behalf of consumers in Scotland who use TPIs.</p>	<p>Building on our successful engagement to date with the proposals for regulating TPIs we will continue to improve the evidence base of key consumer issues in the TPI market, conducting literature reviews, engaging with relevant stakeholders, and commissioning research. We will use this analysis to articulate the problems that exist in the TPI market and produce evidence-based recommendations around which TPIs or aspects of their service should be considered high risk and therefore warranting tight regulation.</p>	<p>Ofgem to be able to promptly introduce proportionate and effective regulation that reflects the interests of consumers in Scotland.</p>	<p>Consumers can have greater confidence when using TPIs that the service is reliable, increasing their willingness to engage and securing a better deal for their energy.</p>

## Increasing consumer confidence

### A universal postal service that consumers have confidence in

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>In 2025 Ofcom announced changes to the universal postal service, which will reduce the number of delivery days for second class post and reduce some quality of service targets. Consumer Scotland recommended a need for closer engagement with consumers and consumer groups to inform USO changes and Ofcom subsequently directed Royal Mail to establish a Customer Engagement Forum to provide insight, advice and challenge on the reform process.</p> <p>At the end of 2025 a further phase of USO reform commenced, focused on pricing and affordability.</p>	<p>We will engage with Royal Mail, Ofcom and other consumer groups across the UK on the implementation of changes to the USO. We will do this through the Engagement Forum and through other bilateral and multilateral engagements. We will engage with Ofcom and Department for Business and Trade to represent Scottish consumers' interests in any changes to USO pricing and affordability systems. We will engage stakeholders and parliamentarians across Scotland to gather intelligence on the effectiveness of USO reform to inform our advocacy. We will scope and design a Post Monitor to identify evidence gaps and provide evidence of Scottish consumers' experiences of letters, parcels and post offices, including USO reform implementation.</p>	<p>The implementation of changes to the USO is delivered openly and transparently, with a clear focus on improving consumer outcomes, including Royal Mail's quality of service performance, and swift action to address any consumer harm identified through the change process.</p> <p>Any further reform to the universal service obligation, including any changes relating to pricing structures, prioritises affordability, consumer confidence and access.</p>	<p>Consumers have trust and confidence in the postal market</p>

## Increasing consumer confidence

### Improving outcomes for tenants

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
Private rented sector tenants in Scotland are often living with issues that landlords should legally resolve, often because a lack of clear information on what their rights are, where they can get advice, and how to navigate redress systems such as the Tribunal. Social rented sector tenants are facing similar issues to varying degrees. A lack of housing supply contributes to the power imbalance in the tenant-landlord relationship.	<p>Consumer Scotland will use our evidence to advocate for access to clearer information and advice, and effective implementation of the Housing Act 2025.</p> <p>We will explore opportunities to streamline access to advice and improve signposting</p> <p>We will work with the Scottish Government and others to help improve redress processes.</p> <p>We will use the findings of our social tenant survey to advocate for improvements across tenures.</p>	<p>It will be easier for tenants and landlords to understand their rights and responsibilities and they will have better access to advice and to redress options.</p> <p>The Tribunal and other redress services will become more transparent and accessible.</p> <p>Policymakers, landlords, and the regulator will ensure that both the social and private rented sector tenants in Scotland enjoy secure tenancies in safe homes.</p>	Tenants live in better conditions. Both tenants and landlords are better informed about rights and responsibilities, and tenants have more confidence to raise and seek resolutions to issues.

## Increasing consumer confidence

### Improving information and redress for postal consumers

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Postal consumers receive information about postal products from a range of sources, including postal operators, physical retailers such as Post Offices and online retailers. A range of information can be useful to consumers when deciding what services to use, including issues of speed, reliability, price and environmental impact. Consumers need this information in clear, accessible ways at the right stage of the buying process.</p> <p>Consumers also need to have access to an effective, robust complaints process if things go wrong.</p>	<p>We will deliver a programme of qualitative research with consumers on their experiences of navigating the complaints process in the postal system. Using this evidence, we will advocate for smooth consumer journeys and clearer information about complaints systems.</p> <p>We will advocate for clear and prominent notification for consumers about key purchasing information, including delivery speed. Building on our decarbonisation research we will advocate for improved consumer information on environmental impacts of postal choices.</p>	<p>Consumers know how to make a complaint and find it easy and straightforward to do so</p> <p>Operators will give more consideration and priority to green delivery options and consumers will be able to make informed choices about the environmental impact of deliveries</p> <p>All postal products have clear and transparent information about delivery speed, reliability and price, reflecting any differences in service to different locations</p>	<p>Consumers have access to clear, trustworthy and relevant information about the postal market</p>

# Improving consideration of consumer matters by public bodies

## Scotland's Consumer Welfare Report

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>The Consumer Scotland Act requires Consumer Scotland to publish a Consumer Welfare Report every three years, with the first report due in 2026.</p> <p>The report will set out how well the interests of consumers are being served in Scotland, and the nature and extent of any harm experienced by consumers in Scotland.</p> <p>We are required to lay the report before Parliament, and send a copy to Scottish Ministers.</p>	<p>We will publish the CWR 2026 shortly after summer recess.</p> <p>The report will draw on a wide range of evidence to inform its response to the statutory questions.</p> <p>We will engage with a range of stakeholder organisations in the development of the report. The work will also involve original survey research with a representative sample of consumers in Scotland.</p>	<p>Our report will aim to bring key consumer issues to the forefront of the minds of public authorities and policymakers, drawing on good quality and robust evidence. The report will raise the profile of consumer issues, highlight the importance of good consumer outcomes, and shed light on some of the key issues currently being experienced.</p> <p>Ultimately, our work will enable informed public debate on the role of government, regulators, advice bodies and consumers themselves in improving consumer welfare.</p>	<p>Consumers will benefit from a renewed focus on consumer welfare, which will increase the extent to which consumer matters are taken into account by policy makers in Scotland.</p>



# Improving consideration of consumer matters by public bodies

## Advancing the Consumer Duty

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Action is needed to further embed a clear focus on consumer principles in public sector decision-making through application of the Consumer Duty.</p> <p>We want the Consumer Duty to become an enabler for an effective reform of public services in Scotland, a reform that helps consumer confidence in public services grow.</p>	<p>We will proportionately monitor where public bodies are applying the consumer duty to strategic decisions and highlight best practice. We will continue our engagement with public bodies highlighting how effective application of the consumer duty can help deliver consumer confidence, economic growth and value for public sector money.</p> <p>We will work with consumer bodies and community groups to highlight how the consumer duty can strengthen the link between the third sector, local communities and public sector decision-making.</p>	<p>Public bodies in Scotland to have a clearer understanding of how the consumer principles apply to users of their services and how they can help deliver better value for money and economic growth.</p> <p>Public sector decision makers to deliver better informed policies with the needs of consumers and local communities fully considered.</p> <p>The third sector and local communities to be more empowered to actively participate in the public policy design process.</p>	<p>The needs of consumers will be better reflected in public sector decision-making leading to less time raising issues or complaints.</p> <p>Consumers will have more confidence in the public services they rely upon.</p>

## Improving consideration of consumer matters by public bodies

### Water consumers at the heart of Strategic Review of Charges 2027-2033

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
The water charges to be paid by consumers in Scotland for the 2027 to 2033 period will be determined by a Strategic Review of Charges (SRC) process. The Review will determine the level of funding Scottish Water requires to fund services and invest in infrastructure in the context of climate change and ageing assets. It is vital that consumers have a central role in the decision process, given the significant impact the Review has on consumer bills and services.	In 2026-2027 we will complete the final phase of our robust deliberative research programme to test consumers' views of Scottish Water's final Business Plan. This follows on from the completion of Phase 1 and 2 of this work in 2025/26. Alongside the research we will continue to engage directly with Scottish Water, WICS, Scottish Government and other key stakeholders to represent consumer interests during the draft and final determination process in 2026.	The draft and final determinations to reflect consumer priorities for investment.	Consumers get the right outcomes from the SRC process – key priorities are invested in, services are delivered efficiently and effectively by Scottish Water and water bills are fair and affordable for all consumers.

## Promoting sustainable consumption

### A water system that responds to climate change

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
Scotland's water sector needs to change to respond to climate change and protect water resources and wastewater infrastructure. New legislation is required to provide an up-to-date legal framework to manage these changes. Consumer Scotland's research is informing the policy change process across water resource planning, surface and waste water management and drinking water quality and security.	Building on our previous research and advocacy, we will continue to contribute to the Scottish Government's policy development processes, providing evidence and analysis on the key priorities for consumers to inform the development of new legislation.	<p>New legislation reflects the key role and priorities of water consumers in enabling the sector to respond the challenge of climate change</p> <p>An ongoing commitment from stakeholders to working in partnership with customers and communities to deliver change.</p>	<p>Improvements in how issues such as water scarcity, water quality and flooding are tackled in Scotland.</p> <p>Consumers feel empowered to contribute to tackling climate change in the water sector, with more support to reduce water wastage and dispose appropriately of household waste.</p> <p>More nature-based solutions are deployed to tackle water infrastructure challenges, delivering wider improved outcomes for consumers.</p>

# Promoting sustainable consumption

## A circular economy that works for consumers

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Household low-carbon choices will contribute to one-third of emissions reduction in 2040. However, while the majority of consumers in Scotland are concerned about climate change, many are unsure what they can do to help support sustainable consumption.</p> <p>Cost, convenience, clarity and confidence are key barriers to consumer behaviour change. Action is required to support consumers to change behaviours, reduce consumption and to increase the reuse and repair of goods.</p>	<p>We will use our consumer climate change framework and evidence base to advocate for the needs and priorities of consumers with a particular focus on actions flowing from the Circular Economy Strategy and the Climate Change Plan.</p> <p>Working with stakeholders, we will advocate for a supportive, enabling environment for consumers.</p> <p>We will input to key policy and practice interventions, including the implementation of the Deposit Return Scheme and Product Stewardship Plan.</p>	<p>Stakeholders, including the Scottish Government, to work in closer collaboration and to have a clearer understanding of the needs and priorities of consumers.</p> <p>The impact of measures, individually and collectively, on consumers to be better understood and considered.</p> <p>As a result, future legislation and policy to have a stronger focus on consumer needs and protections. Consideration of barriers to consumer action will happen earlier in the policy making process.</p>	<p>Consumers will benefit from a more enabling environment, where it is more affordable, straightforward and safer to make sustainable choices, and where they can access the support needed.</p> <p>Policy makers will understand the consumer journey and barriers to change, better allowing potential consumer to be identified and addressed.</p>

# Promoting sustainable consumption

## Heat networks delivering for consumers

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Currently, around 1.5% of Scotland's heat is supplied from heat networks, but the Scottish Government has set an ambitious target to increase this to 8% by 2030.</p> <p>The sector will be regulated by Ofgem from early 2026. Regulation needs to address the issues impacting consumers in the sector.</p> <p>Growth is expected within the sector to support the decarbonisation of Scotland's buildings. Consumers need to be supported when asked to connect.</p>	<p>We will continue to work with Ofgem to ensure that regulation delivers better outcomes for heat network consumers.</p> <p>We will continue to work with our third sector delivery partners to provide heat network consumers with access to advice and support.</p> <p>We will engage with Scottish Government policy teams to ensure that future heat network consumers are considered and protected in the transition to low carbon heating.</p>	<p>Heat network regulation must deliver improved protections for consumers on areas such as fair pricing, reliability and quality of service. Consumers are engaged at the earliest point of local heat network development. Consumers must be incentivised and supported to connect to local heat networks, when available. The Scottish Government's forthcoming Buildings (Heating and Energy Performance) and Heat Networks (Scotland) Bill is designed to enable and empower consumers to take action to decarbonise their homes.</p>	<p>Heat networks deliver reliable, safe and affordable low carbon heating to a growing number of consumers across Scotland.</p> <p>Heat network consumers have access to appropriate advice, redress and support and are protected against detriment.</p>

## Promoting sustainable consumption

### Tackling barriers to the take-up of Electric Vehicles

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Positively, EVs are being adopted increasingly widely by consumers. However, there are challenges around the inequality of experience between those who can and cannot charge at home.</p> <p>Home charging is both convenient and significantly cheaper than running a petrol or diesel vehicle. As far as possible, we want a similar experience to be available for those EV drivers who can't charge at home</p>	<p>In 2025-2026 we are delivering new research to update our previous work in this area, with a central focus on better understanding the experiences and aspirations of current and potential EV drivers who cannot charge at home.</p> <p>We will continue to work with stakeholders to take forward the recommendations flowing from the new research. We will also deliver a new stakeholder forum, in partnership with Transport Scotland, to provide a shared forum to improve the consumer experience.</p>	<p>An appropriate range of solutions is available to support the development of charging facilities for those consumers enable to charge at home</p>	<p>Improved access to attractive and affordable charging facilities for all EV drivers, including those not able to charge at home, making it easier for more consumers in Scotland to access the Electric Vehicle market</p>

## Promoting sustainable consumption

### Improving access to low carbon technologies and advancing energy efficiency

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Lowering emissions from home heating is an essential part of Scotland's transition to more sustainable consumption. These will have significant effects on consumers' homes during the years ahead.</p> <p>It can be costly and complex to install low carbon technologies and doing so can be disruptive for consumers in their homes. It is vital that consumers have the advice, support, information, financial resources and protection that they need as they go through this process.</p>	<p>We will build on previous work on this issue, including our investigation into Scotland's green home heating market. We will continue to advocate for improved incentives, information and protections for consumers. We will do this through supporting work on issues such as EPC reform, minimum energy efficiency standards and the development of the future advice service. We will work with the Scottish Government to support the development of the Buildings (Heating and Energy Performance) and Heat Networks (Scotland) Bill.</p>	<p>The Buildings (Heating and Energy Performance) and Heat Networks (Scotland) Bill is designed to enable and empower consumers to take action to decarbonise their homes.</p> <p>Actions are taken to streamline and improve the consumer journey, raising the standards of advice, protection, and redress, thereby elevating overall consumer confidence.</p>	<p>It is much easier for consumer to make improvements to their homes to improve energy efficiency, reduce bills and reduce emissions.</p> <p>In making these improvements, consumers are better protected from harm and have more confidence in the market, contributing to the achievement of climate change targets, and to the wider economy.</p>

# Advancing inclusion, fairness, prosperity and wellbeing

## Fast, affordable and reliable telecommunications

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
Telecommunication networks allow consumers to communicate, access services and participate in society. Despite recent improvements, some consumers in Scotland are not able to access, or do not take up this enhanced connectivity. Consumers in Scotland may also have lower levels of choice between providers compared with the rest of the UK. 9% of consumers in Scotland face digital exclusion, while others face digital skills or affordability challenges, raising a risk of isolation or lack of access to services.	Consumer Scotland will provide robust and independent advocacy on behalf of consumers, seeking to influence development of telecommunication networks regulation. We will publish scoping work identifying the key issues affecting telecommunications consumers and priority areas for action. We will engage with regulators, governments and providers to ensure that consumers are considered and protected in the roll out of next generation services. We will represent consumers on key telecommunications consumer forums.	Telecommunications network regulation and roll-out to be designed with a clear understanding of and focus on the issues that matter to consumers in Scotland. Telecommunications regulators to have a clear understanding of the consumer perspective and to be responsive to this.  Telecommunications consumers to have access to high quality advice and support.  The delivery of services by providers to take account of the needs of consumers in Scotland.	Telecommunications consumers across Scotland can choose from a range of competitive, fast, reliable and affordable services. Consumers are protected from harm and have access to advice, support and redress should they need it.



# Advancing inclusion, fairness, prosperity and wellbeing

## Reduced electricity distribution charges

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Consumers in the north of Scotland pay some of the highest distribution charges of any area in Great Britain. This contributes to higher bills and higher unavoidable fixed costs within those bills.</p> <p>As the energy market is a national one, we do not consider this fair, as consumers in Scotland do not get to benefit from the prevalence of renewable generation directly</p>	<p>We will produce analysis to support a change to the way distribution charges are recovered.</p> <p>We will advocate for UK government and Ofgem to change the charging arrangements accordingly.</p>	<p>DESNZ and Ofgem to revise distribution charging arrangements by make licence and code modifications.</p>	<p>Reduced distribution charges for consumers in the north of Scotland.</p>

# Advancing inclusion, fairness, prosperity and wellbeing

## Accelerating the roll out of smart meters

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>The smart meter rollout in Scotland is lagging behind the rest of GB, in some areas dramatically so. There are several reasons for this, not least the geographic profile of consumers in Scotland, meaning they can be more difficult to reach and the incentives for individual suppliers to prioritise certain regions in Scotland are limited.</p> <p>The slow pace of the rollout has limited Scottish consumers' ability to access certain deals, and will become an increasing disadvantage as we see more time of use and dynamic tariffs appear.</p>	<p>We will formulate a set of recommendations for how the smart meter rollout could be accelerated in Scotland, including assessing whether greater collaboration between suppliers could be required, or whether the rollout should be moved to DNOs, and ensuring upcoming changes such as the 2G and 3G switch-off are factored into plans.</p> <p>We will advance these recommendations with UK government and Ofgem.</p>	<p>Scotland to be better prioritised as part of the rollout going forward, ensuring greater penetration of smart meters by 2030 Ofgem.</p>	<p>Consumers are able to access a wider variety of smart tariffs, securing a better deal for their energy.</p>

# Advancing inclusion, fairness, prosperity and wellbeing

## A future energy retail market that works for consumers in Scotland

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
The existing retail energy market design is unlikely to produce fair and inclusive outcomes for consumers, or to support the changes needed to enable the transition to net zero. This will mean relaxing some regulations to allow for innovation, while strengthening others to ensure consumers can engage with confidence.	We will examine how price regulation needs to evolve to continue to be relevant for consumers, and to consider how other aspects of the market design need to change to maximise the benefit of the energy transition for consumers. We will work with Ofgem and other stakeholders on future data and digital infrastructure needed to support all consumers to benefit from energy system changes	Ofgem and DESNZ to actively consider consumers in Scotland, and the specific issues affecting them, in the design of a future GB energy market.  Ensure policymakers understand the distributional impacts of changes already underway in the energy retail market, and take action to ensure those unable to engage are protected.	A fair and sustainable energy market where current and future consumers, including those in vulnerable circumstances, have access to affordable energy in markets that prioritise positive consumer outcomes.

# Advancing inclusion, fairness, prosperity and wellbeing

## Fair and equitable postal services

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Different consumer groups in Scotland experience different parts of the postal service in different ways:</p> <ul style="list-style-type: none"><li>• Stamp prices have risen sharply in recent years, but Ofcom is considering further relaxing existing affordability protections in the market.</li><li>• Consumers with no fixed address can find it difficult to get access to important post.</li><li>• Island communities in Scotland have very different experiences of letters, parcels and Post Office provision.</li></ul>	<p>Building on previous work on these issues we will:</p> <ul style="list-style-type: none"><li>• Continue to engage with Ofcom to advocate for affordability protections for all consumers</li><li>• Work with Citizens Advice, other consumer bodies and third sector partners in Scotland on the development of an Address and Collect service for consumers with no fixed address</li><li>• Build on our previous research, to advocate for improved protections for island communities in Scotland across Post Office, parcels and letters services</li></ul>	<p>Retention of the Second Class safeguard cap to ensure mail remains affordable for all consumers</p> <p>Progress towards an Address and Collect scheme which works for consumers in Scotland</p> <p>Introduction of postcode area level Quality of Service standards for island communities</p> <p>Enhanced clarity and consumer awareness on protections related to use of local couriers and hauliers within island communities.</p>	<p>The postal market is fair and equitable for consumers – particularly those facing postal exclusion or those in island communities</p>

# Advancing inclusion, fairness, prosperity and wellbeing

## Strengthening the evidence base on the issues that matter for water consumers

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
As Scotland's water sector responds to climate and infrastructure challenges amid affordability concerns, it is vital to strengthen consumer focus. This creates an opportunity to build a robust evidence base that ensures consumer voices inform decisions. Consistent insight will help align sector priorities with consumer needs, supporting fairness and resilience as the sector evolves.	We will design and implement a repeatable consumer survey to gather representative data on attitudes, experiences, and needs. Working with research partners and engaging stakeholders, including Scottish Water and regulators, we will ensure inclusivity, reflecting vulnerable and underrepresented groups. The survey will align with existing data sources to maximise value and avoid duplication, creating a foundation for consistent insight and trend analysis over time.	Consumer Scotland aims to strengthen evidence-led decision making across the water sector. We want consumer insight to be used proactively to shape policy, improve service delivery, and target support effectively. This is about embedding consumer perspectives into planning and operations, ensuring decisions reflect lived experience and promote fairness.	Consumers will benefit from services that better reflect their needs and expectations, with improved responsiveness and support. Over time, the repeatable survey will build a clearer picture of what good service looks like from a consumer perspective, enabling continuous improvement. This approach ensures consumer voices remain central to sector development, fostering trust and fairness.

# 5. Performance Framework

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## Performance Framework

We **published our Performance Framework in 2023** and this sets out how we track our impact and performance. The Framework includes quantifiable organisational activity indicators; workstream monitoring; our recommendations register; and impact assessments.

We **report on our performance against this framework through our Annual Report and Accounts**, which are subject to external audit, laid before the Scottish Parliament and published on our website. We have also published our detailed impact assessments, which are in a case study format, on our website.

In 2025-2026, in line with our legislation, **we have commissioned an independent review of our performance**, which is considering our first three years of operation as an organisation.

We are **carrying our further development work on our performance framework**, which we will complete in 2026.

# 6. Funding

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## Funding

Consumer Scotland receives core funding from the Scottish Government's annual budget, which is approved by the Scottish Parliament. For 2026-2027 our proposed general resource funding is £4.550 million, inclusive of funding for:

- the Consumer Advocacy and Education work plan delivered by Citizen's Advice Scotland
- the consumeradvice.scot service delivered by Advice Direct Scotland

We also receive funding for advice services, research and advocacy activity in electricity, gas, heat networks, post and water sectors. This funding is provided via levies, which are derived from consumers' bills and which are administered by the UK and Scottish Governments.

Our levy funding requirements for 2026-2027 are set out in **Table 2** below. This also includes funding for the delivery of:

- Big Energy Savings Network (delivered by Citizens Advice Scotland)
- energyadvice.scot and postadvice.scot services (delivered by Advice Direct Scotland).
- Tier 2 advice for electricity, gas, heat network and post consumers (delivered by CAS' Extra Help Unit)
- The Scottish element of GB-wide consumer advocacy activity in gas, electricity and postal sectors (delivered by Citizens Advice)

An overview of our strategic funding partnerships is provided at **Table 3** below.

**Table 2: Levy Funding 2026-2027**

\*Note all costs are those anticipated at the time of publication of this Draft Work Programme.  
Budgets are subject to final confirmation with the relevant funding organisations.

	Energy	Post	Water	Heat Networks	Energy and Post Advice	Consumer	Directorate
Programme	£123,000	£70,000	£123,000	£31,000			
External Delivery (Big Energy Savings and Tier 1 and Tier 2 advice)	£338,000			£313,000	TBC		
Staffing	£660,000	£160,400	£312,000	£264,500			
Staff-related Costs							
Contribution	£58,600	£15,500	£26,500	£23,400			
Scottish Contribution to GB-wide advocacy work delivered by Citizens Advice	£171,700	£34,750				£69,369	£10,272
<b>Total</b>	<b>£1,351,300</b>	<b>£280,650</b>	<b>£461,500</b>	<b>£631,900</b>	<b>TBC</b>	<b>£69,369</b>	<b>£10,272</b>



**Table 3: Strategic Funding Partnerships 2026-27**

Activity area	Name of partnership organisation	Partnership description
Consumer advocacy and education	Citizens Advice Scotland	Consumer Scotland will administer a consumer advocacy and education grant to Citizen's Advice Scotland in 2026-2027. This funding partnership ensures that the work delivered by CAS complements our statutory outcomes and strategic priorities, helps consumers who need it the most and delivers value for money.
Consumer advocacy	Citizens Advice (England and Wales)	Consumer Scotland will administer the Scottish element of GB-wide consumer advocacy activity in gas, electricity and postal sectors that is delivered by Citizens Advice. We will work in close partnership with Citizens Advice to achieve effective alignment, complementarity and value for money in the delivery of this work.
Consumer advice	Advice Direct Scotland	Consumer Scotland will administer the Consumeradvice.scot grant to Advice Direct Scotland in 2026-2027. This partnership will allow us to better align our strategic advocacy with the delivery of advice services
Tier 1 Energy and Post Advice	Advice Direct Scotland	From 2026-27, Consumer Scotland will fund Advice Direct Scotland to support delivery of the energyadvice.scot service; for gas and electricity and heat network consumers and the postaladvice.scot service. This partnership will allow us to better align our strategic advocacy with the delivery of advice services.
Tier 2 Energy and Post Advice	Citizens Advice Scotland (Extra Help Unit)	From 2026-27, Consumer Scotland will fund the Extra Help Unit to deliver Tier 2 consumer advice for energy and post consumers, allowing us to better align strategic advocacy with the delivery of advice services.
Big Energy Savings Network and Worried this Winter Campaign	Citizens Advice Scotland	We will continue to work in partnership with Citizens Advice Scotland to enable the delivery of the Big Energy Savings Network (BESN) project and the energy support awareness raising campaign. Both programmes are delivered in communities across Scotland by Citizens Advice Bureaux and other third-sector partners.

## Appendix 1 - Our Supporting and Scoping Work

Alongside the activities described in main body of the Draft Work Programme, Consumer Scotland will also be supporting work in 2026-2027 to represent the interests of consumers across markets and services.

The landscape for consumers can shift quickly and we will also scope a select number of areas of potential future activity during 2026-2027.

Details of our supporting and scoping work for 2026-2027 are provided in the tables below.

### Supporting Work

Market Area	Activity	Description
Consumer Markets	Public Transport	We will engage in follow-up advocacy on our reports, on issues including sustainability, safety and accessibility, and the needs of consumers in rural areas. We will continue our engagement with the Great British Railways Bill which reforms arrangements for redress and representation for rail consumers to ensure issues affecting consumers in Scotland are highlighted appropriately. We will also continue stakeholder engagement and membership of relevant working groups.
Consumer Markets	Regulations that deliver for consumers	During 2025-2026 proposed changes to regulatory frameworks in a number of markets will impact on consumers in Scotland. This includes the commencement of new UK-wide provisions in relation to digital markets, competition and consumer protection and the delivery of new Scottish Government strategies and plans on digital issues and on rural delivery. We will use our expertise and our evidence base to advocate for better consumer outcomes and identify measures which can be put in place to reduce risks of consumer harm. This may include stakeholder engagement, publishing briefings or contributing to regulatory policy or parliamentary consultations. We will aim to ensure regulators, governments and others consider the needs and aspirations of consumers in Scotland when developing policy and regulatory measures.
Consumer Markets	Legal Services	Following our work to influence the shape of the Regulation of Legal Services Act, we will continue our membership of the Independent Consumer Panel,

		working alongside partners to optimise the impact of its revised remit and secure the effective implementation of the Act for consumers. We will also respond to key Scottish Government policy developments, such as the intended reforms to legal aid, participating as a member of the Fee Review working group and more generally seeking opportunities to advocate for more consumer centred legal services and a stronger user voice.
Energy	Energy tracker survey	We record and analyse consumer experience of energy markets through our energy tracker, with a controlled sample representative of the population of Scotland. We will continue to run the tracker annually to add to our understanding of changing consumer experience over time.
Energy	Stakeholder engagement	We will contribute to a wide range of both regular and ad hoc meetings and delivery groups with Scottish and UK Governments, the regulator, consumer advice stakeholders and industry partners, to represent consumer interests. We will continue to participate in key stakeholder forums.
Energy	Metering	As the Radio Teleswitch Service (RTS) switch-off proceeds, we will continue to play a role in monitoring progress, identifying and advocating for any changes or improvements that are required on behalf of consumers.
Energy	Markets and systems	<p>We will engage with a range of processes to represent consumers' interests in proposed changes to energy markets and systems.</p> <p>This will include ongoing advocacy and engagement on the next steps in the UK Government's Review of Electricity Market Arrangements (REMA), including its plans for a reformed national market; network price controls; connections reform and regional system planning; future of the gas grid; and working with the NESO in strategic partnership.</p>
Energy	Park homes	We will continue to identify the specific issues experienced by energy consumers residing in park homes. We will work with stakeholders to raise the profile of these issues, to ensure consumers are informed of their rights and to advocate for change on consumers' behalf.

Post	Post Offices	<p>We will monitor the data provided to us by Post Office Ltd on the post office network, including location, type of branch and business mix. We will continue to review any consultation responses from Post Office branch changes and will engage with Post Office where we are concerned about potential negative consumer impacts of change to Post Office branches.</p> <p>We will also continue to engage with the next steps for the UK Government's work on the future of the post office network</p>
Research and Analysis	Strengthening the evidence base	We will continue to work to improve the quality and quantity of evidence available to Consumer Scotland and stakeholders. This includes our ongoing participation in the ScotStat Board, the operation of our two framework agreements which support Consumer Scotland's survey research and research with consumers in vulnerable circumstances, and management of our data sharing agreements with key partners, ensuring our processes for research and analysis are robust and monitoring and reporting on impact.
Water	High-Level Group and Strategy Group	We will continue to represent consumers' interests in key strategic groups in Scotland's water sector, including the High-Level Group and the Strategy Group.
Water	Future Investment Group	We will work with key water sector stakeholders to provide advice to the Scottish Government that will help shape the Ministerial Objectives for 2027-33.
Water	Future Charging Group	We will work with key water sector stakeholders to provide advice to the Scottish Government that will help shape the Principles of Charging for 2027-33.
Water	Private Water Supplies connections project	We will support the Scottish Government to test connection of communities on private supplies to the water mains and how this may be achieved.
Water	Understanding the consumer experience	Building on our published reports and subsequent stakeholder engagement, we will continue to develop our approach to mapping data and evidence across targeted topics to better understand the consumer experience of Scotland's water sector. We will continue to examine existing data to identify key issues, gaps and emerging trends across the range of

		issues that matter to consumers. We will engage with key water stakeholders to help identify actions emerging from this work that can help to drive consumer improvements.
Water	Transitioning Surface Water Collection to Surface Water Reuse	We will represent the consumer perspective in supporting Scottish Water's ambition to reduce the volumes of rainwater entering the combined sewer network by transitioning Scotland's surface water collection and treatment systems to surface water reuse systems.

### Scoping Projects

Market Area	Title	Description
Consumer Markets	Public services that consumers need	We will conduct scoping work aimed at identifying key issues for consumers in relation to those public services that are used by consumers on a regular basis. We will draw on our previous work in key markets such as transport and social housing, along with our experience of developing guidance on the consumer duty, focusing on key issues for consumers, identifying key levers or opportunities for change, including the impact of public services reform.
Cross-Market	Consumers in Scotland and AI	We will undertake an examination of the key challenges, opportunities, risks and future considerations that AI presents across different markets for consumers in Scotland

## Appendix 2 – Breakdown of Projects by Levy Area

	Key Projects	Supporting Work
<b>Energy</b>	More affordable energy bills	Energy tracker survey
	Improving consumer experience of TPIs	Stakeholder engagement
	Tackling barriers to the take-up of electric vehicles	Metering
	Improving access to low carbon technologies and advancing energy efficiency	Markets and systems
	Reduced electricity distribution charges	Park homes
	Accelerating the roll out of smart meters	
	A future energy retail market that works for consumers in Scotland	
<b>Heat Networks</b>	Heat networks delivering for consumers	N/A
<b>Post</b>	A universal postal service that consumers have confidence in	Post Offices
	Improving information and redress for postal consumers	N/A
	Fair and equitable postal services	
<b>Water</b>	Supporting vulnerable water consumers	High-Level Group and Strategy Group
	Preventing and dealing with water debt	Future Investment Group

	Tackling water poverty	Future Charging Group
	Improving consumer outcomes in the non-household water market	Private Water Supplies connections project
	Water consumers at the heart of the Strategic Review of Charges 2027-2033	Understanding the consumer experience
	A water system that responds to climate change	Transitioning Surface Water Collection to Surface Water Reuse
	Strengthening the evidence base on the issues that matter for water consumers	N/A

## Appendix 3 – Our impact in the past year

Consumers in Scotland have faced multiple challenges and opportunities in during the past 12 months, since we published our 2025-2026 Work Programme.

As Scotland’s statutory consumer advocate, we have delivered a substantial programme of activity in this time, to represent the interests of consumers across the economy, and secure positive outcomes in a wide range of different markets.

A summary of key areas of work that we have delivered is provided below.

### Reducing harm to consumers

We pressed Ofgem for action over many months to tackle risks to consumers presented by the **switch off of RTS electricity meters**. The regulator provided written assurance on the phasing of the switch off, contingency planning, customer communications, escalation routes, engineering capacity, and enforcement and accountability. Only select regions with a small number of RTS meters have been part of the early phases of the switch off in Scotland while further switch offs here have been paused until spring 2026 to minimise the risk of negative impacts over winter.

We engaged closely with Ofgem on its proposals for a **Debt Relief Scheme** for energy consumers. We advocated for the development of the scheme and provided advice on the data that should be used to identify eligible consumers, to avoid disadvantaging consumers in Scotland.

We highlighted a number of problems with Ofgem’s original plans for **standing charge reform**. The proposed changes would have benefitted some consumers but we were concerned that the proposals would have introduced additional complexity and led to more consumers being worse-off. Ofgem has revised its approach to a more balanced model which will give consumers greater choice of tariffs.

We advocated for improved consumer protection during the UK’s **switchover to digital landline telephones**. One of our key recommendations was for action to improve public awareness and in June 2025 an industry-led awareness raising campaign targeting telecare users and their support networks was launched. We engaged with BT, Openreach and Virgin Media to influence the design of their outreach and engagement programmes to ensure these work effectively for consumers in Scotland.

We published new research and provided evidence to government and parliament on the key consumer issues in the passage of the **Housing Act 2025**. Our work focused on the need for further action on eviction grounds, rent controls, property factoring and support for domestic abuse survivors. The government has committed to action on each of these areas.

We provided evidence to the Health Social Care and Sport Committee on new legislation to regulate **non-surgical procedures**. Our recommendations focused on



the need for improved consumer information, and enhanced transparency and accountability to enable consumers to make informed choices and to get redress if things go wrong.

We continued to engage with the Scottish Government, regulators and industry to press for action to resolve the significant problems experienced by former clients of the **collapsed law firm McClures**. We received written assurances from the successor legal firm that those affected in Scotland would be contacted in the same timeframes as those in England and Wales, despite the more limited regulatory powers on this issue in Scotland.

We published the final report from our first investigation into Scotland's **green home heating market**. We made recommendations on the actions required to tackle consumer detriment in this market, including proposals for improved consumer information, advice, funding, standards, enforcement and redress. Our work in this area received widespread media coverage and we are pleased that positive early action is now underway across a number of these areas.

We ran a six-week, nationwide information campaign for consumers in the run up to Christmas, highlighting the **importance of registering electrical goods**. At present, we know that around only 10% of consumers register electrical goods after purchasing and the registering of goods is what determines the effectiveness of the recall of goods database owned by the Office of Product Safety and Standards (OPSS).

### Improving consumer confidence

We delivered a significant research and advocacy programme to represent consumers' interests in reforms to the **universal postal service**. We published new evidence on the potential impact of the changes for consumers in Scotland. Our recommendations were highlighted in the media and we provided evidence to the Scottish Affairs Committee to support its scrutiny of the consumer impacts in Scotland. We engaged widely with Ofcom, Royal Mail and other key stakeholders to advocate for improved consumer outcomes including better provision of information to consumers in both the USO and parcels market. The regulator, Ofcom, has now required Royal Mail to establish a Customer Engagement Forum to inform the implementation of the reformed service, responding to a key Consumer Scotland recommendation for a stronger consumer voice in the change process.

We engaged extensively with Ofgem during the past year as it has designed the **new regulations to protect heat network consumers across Great Britain**. The new regulations will go live in January 2026. Our evidence and insight have influenced key aspects of the new regulation system, including measures on pricing, billing, cost recovery and consumer protection.

Alongside our work to help shape new heat networks regulations **we have set up new advice services for heat network consumers in Scotland**, working closely with our partners Advice Direct Scotland and Citizens Advice Scotland. These new advice services have been available to customers in Scotland since April 2025.

We have engaged with the UK Government to influence plans for new legislation to **regulate Third Party Intermediaries (TPIs), such as price-comparison websites, aggregators and auto-switching services, in the energy market**. The government has committed to adopting a “hybrid” authorisation regime for the new regulations, which will enable closer scrutiny of high-risk TPI business models. This is a change from its original proposals and is in line with the model that Consumer Scotland recommended. The new regulations, when put in place, will help to protect users of TPIs from risks such as poor customer service, difficulties resolving complaints and lack of transparency.

We chaired the stakeholder group which led the work to introduce the first ever code of practice for suppliers in **Scotland’s non-domestic water market**, to improve the services delivered to business consumers

We published new research on the experiences of **700 small businesses in Scotland, examining their experiences as consumers in 11 different markets**. Our recommendations highlight the need for a greater focus by regulators on the issues that small businesses encounter as consumers (forthcoming)

#### **Improving consideration of consumer matters by public bodies**

We engaged extensively with the passage of the **Regulation of the Legal Services Act 2025** to ensure that the new legislation delivers for consumers. Our recommendations focused on improving the accountability and transparency of regulators and strengthening consumer representation. Our advocacy informed changes to the legislation which will require regulatory bodies to demonstrate how they are meeting objectives, and provided for more avenues through which a regulator’s performance can be reviewed, a strengthened remit for the Independent Consumer Panel and the inclusion of a post legislative review requirement.

We have delivered a programme of research and advocacy on the changes required to enable more people in Scotland to **take-up Electric Vehicles (EVs)**. Transport Scotland has now agreed to work with Consumer Scotland to set up a Consumer Electric Vehicle Insight Group which will bring together government, consumer groups and industry. The group will work together to address key challenges we have identified including cost, availability and reliability of the public charging network, difficulties in charging at home for some consumers, the need for better pre-sale information on key issues such as battery range, and access to good quality repairs and servicing.

We are delivering on our Memorandum of Understanding with Scottish Water and the Water Industry Commission for Scotland to put **consumer evidence at the heart**

**of the Strategic Review of Water Charges for 2027-2033.** We have delivered the first two phases of our in-depth deliberative research with consumers, to inform Scottish Water's draft Business Plan and the development of the final business plan. We will shortly be undertaking the final phase of the research, during which consumers will give their views on whether the final plan commands their support, to inform the Water Industry Commission for Scotland's Determination of Charges.

We delivered information sessions on the **Consumer Duty** with around 40 public bodies including government, local authorities, health boards and regulators and provided 10 bespoke webinars to public bodies at senior decision-maker level. These sessions have demonstrated to authorities the wider benefit of the consumer duty such as enhanced consumer confidence in public services and the potential to contribute to economic growth. Effective application of the consumer duty will deliver more effective and inclusive decision making by public bodies, less time and money wasted in resolving complaints, public services more reflective of consumer needs and overall better value for public sector money.

### Promoting sustainable consumption

We published a new toolkit to inform policymakers take account consumer interests when **addressing climate change**. Our '4Cs' framework of **cost, convenience, clarity and confidence** has attracted significant interest from decision-makers across UK, Scottish and local government

We published new research and recommendations on the actions required to make it easier for consumers in Scotland to take-up **low carbon technologies such as heat pumps and solar PV**. We have engaged closely with the Scottish Government on its plans for **heat in buildings**, representing consumer interests on the government's heat in buildings strategy group

We published new research on the barriers to consumers taking up more **sustainable transport**. Our work secured prominent media coverage and we engaged with government and delivery agencies on our recommendations. A number of actions are now being taken forward which address key issues highlighted in our report, including on cost, safety and information.

We published new evidence on consumer views on **climate change and Scotland's water sector**. Our recommendations focus on the need for government and industry action to support public engagement, provide accessible information and better enable consumer behaviour change.

We published new evidence of **consumers' views on the circular economy in Scotland**, including product stewardship, single use cups and the Deposit Return Scheme and made recommendations to improve how these systems function for consumers (forthcoming)

## Advancing fairness, inclusion, prosperity and wellbeing

We published in-depth new research on the **experiences of disabled consumers in rural Scotland in accessing transport, leisure services and health and social care**. Our recommendations make proposals for improvements in each of these sectors and in the government's strategic approach to addressing the concerns of disabled rural consumers.

We provided evidence to the UK Government to inform the development of **Great British Railways**, highlighting key issues of importance for consumers in Scotland, including accessibility, investment and alignment with delivery in Scotland

We published new research on the **accessibility and safety issues experienced by public transport consumers** in Scotland (forthcoming)

We provided advice to Ofcom to inform its **Telecoms Access Review**, with our recommendations focusing on the actions required to ensure that consumers in remote and rural Scotland receive a fair and equitable quality of service

We published new analysis on the **affordability of consumers' water bills** in Scotland and made recommendations to the Scottish Government to increase the discounts offered to consumers, to tackle water poverty. The government has now committed to reviewing the system for affordability measures in the sector during the next water charging period, recognising the limitations of the current system. This responds directly to one of the key recommendations in our report.

We encouraged more action by Ofgem and the UK Government to improve **the roll out of energy smart meters**, highlighting that the supplier-led roll out programme is significantly behind in Scotland in general and in rural and remote Scotland in particular, compared to other parts of Great Britain

We published commentary of the UK Government's work to date on **the Review of Electricity Market Arrangements (REMA)** and set out our views on the next steps that are required to deliver positive outcomes for consumers in Scotland

We published new analysis on the actions required in the future **GB energy retail market** to ensure a just transition is delivered for consumers in Scotland, focusing on energy bill support, consumer protection, innovation and digital inclusion

We have engaged with Ofgem and provided detailed evidence to represent the interests of consumers in Scotland in the initial phase of the regulator's **cost allocation and recovery review in the energy market**.

We provided evidence to the UK Government to inform the development of the **Warm Home Discount scheme** to ensure it delivers effectively for consumers in Scotland. Our recommendations for action focus on scheme eligibility, automated payments, the level of support provided, access to the scheme and the need for better recognition of the needs of high essential energy users. Our proposals for action received prominent media coverage.

We have convened third sector organisations across Scotland to provide insight and advice to inform improvements to the system of providing **postal services for consumers with no fixed address**. Our work has focused on identifying key issues that may have specific impacts for users of the system in Scotland, to ensure that these are understood and responded to in UK-wide systems.

We provided evidence to Ofcom to inform its review of **affordability and pricing in the postal market**, with our recommendations focusing on the need to ensure ongoing affordable access to second class post for all consumers. Our work on this issue has attracted significant media coverage.

We launched new research to examine **how effectively letters, parcels and post offices deliver for consumers in Scotland's islands** and identify priorities for improvement. We have published initial commentary on the emerging findings from this research. **The Scottish Government has recognised the importance of postal services in its new National Islands Plan**, reflecting our evidence about postal service standards in Scotland's islands. The Scottish Government has committed to working further with Consumer Scotland on this issue.

We have **engaged directly with parcel operators** to ensure that consumers in rural Scotland are provided with clear and transparent information about the availability of postal products in their area.